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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

UNITED STATES OF AMERICA

Case No. 6:11-CR-60097-AA

v.

CODY SETH CRAWFORD,

MOTION FOR PROTECTIVE  
ORDER PERTAINING TO  
DISCOVERY

Defendant.

The United States of America, by S. Amanda Marshall, United States Attorney for the District of Oregon, and William E. Fitzgerald, Assistant United States Attorney, hereby moves this Court for a protective order pursuant to Rule 16(d)(1), Federal Rules of Criminal Procedure, seeking to prevent the dissemination of sensitive discovery materials to persons not a party to, or involved in this case.

As part of discovery in this case, and in addition to material the government is seeking separate authorization to disclose with restrictions on dissemination, the government will be providing defendants' attorneys of record further sensitive discovery material including reports of interviews, reports of investigative activity. The government is also requesting that the protective order extend to any personal identifying information of any individual, including without

limitation, any individual's date of birth, social security number, address, telephone number, email address, driver's license number, professional license number, or family members' names.

It is requested that this Court order that defense counsel not reproduce or disseminate to persons not a party to, or involved in this case, and not allow the defendant to have unsupervised access to the discovery material specifically listed above.

It is further requested that the Court order that copies only be provided to those persons employed by the attorney who are necessary to assist defendant's attorney in preparation for trial.

The government anticipates that there may be specific nonsensitive discovery material that defense counsel believes an exception should be made to the proposed protective order. In such instance, the government will meet and confer with defense counsel and the parties will then seek guidance from this Court, if necessary. The parties will advise the Court by letter of any exceptions made to the protective order. Defense counsel, Bryan E. Lessley, does not object to the proposed protective order.

Dated this 7th day of March, 2013.

Respectfully submitted,

S. AMANDA MARSHALL  
United States Attorney

/s/William E. Fitzgerald  
WILLIAM E. FITZGERALD  
Assistant United States Attorney